

### **REMARKS**

Claims 1, 5-6, 8-10, 13-15, 22-35, and 40-41 were pending in this application. Claims 5-6, 8-10, and 41 have been cancelled. Claims 1 and 35 have been amended to require that the logic layer is configured to choose between various responses provided by the administrator, and not user, as previously stated. No new subject matter is believed to have been added by these amendments. No claims have been added. Therefore, claims 1, 13-15, 22-35, and 40 remain in this application.

#### **35 U.S.C. §112 Rejections**

Claims 1, 6, and 35 stand rejected under 35 U.S.C. §112, second paragraph, for indefiniteness. In the previous Amendment, Applicants inadvertently amended the claims to specify that the logic layer is configured to choose between various responses provided by the *user*. Applicants intended that the responses be provided by the *administrator*, even though the administrator is in effect a user of the system. Thus, Applicants' error was a semantics issue that has now been corrected via the aforementioned clarifying amendments. Accordingly, the Examiner's latter suggested wording to overcome the indefiniteness rejection is correct and is appreciated by Applicants. Reconsideration of these rejections is respectfully requested.

#### **35 U.S.C. §103 Rejections**

Claims 1, 5-6, 8-10, 13-15, 23-24, 27-35, and 40-41 stand rejected under 35 U.S.C. §103(a) for obviousness by the previously cited Chikirivao patent publication (United States Patent Application Publication No. 2003/0163783) in view of newly cited non-patent publication entitled "Natural Language Interfaces to Databases -- An Introduction," by Androutsopoulos et al. (hereinafter "the Androutsopoulos publication"). Specifically, the Examiner asserts that the Androutsopoulos publication discloses the previously added claim limitations and that it would be obvious to combine the teachings of the Androutsopoulos publication with those of the Chikirivao patent publication.

The Androutsopoulos publication only discloses the aspect of processing input in a generalized NLP-database context, and, more specifically, to sentence parsing. The

Examiner is attempting to apply to the claims the general concept of contextual substitution of terms in a user's input. For example, the claim limitation: "wherein the logic layer is configured to choose between various responses provided by the user" is equated by the Examiner to the act of substituting a pronoun with an entity from a list maintained by the system described in the Androutsopoulos publication. As discussed above, Applicants have amended independent claims 1 and 35 to require that the various responses be provided by the administrator instead of the user. Accordingly, this claim limitation no longer reads in the context of the user. Specifically, the logic layer aspect relates to responses provided to the administrator. The distinction and interplay between "requests" (referring to what a user provides) and "responses" (referring to what an administrator provides) is set forth in independent claims 1 and 35. The Androutsopoulos publication discloses the aspect of contextual substitution only in the context of user input and fails to disclose contextual substitution in the context of an administrator provided response. Accordingly, the claim limitations that the Examiner asserts are found in the Androutsopoulos publication are in fact not disclosed therein.

As set forth on page 6, lines 9-11 of the Office Action, the Examiner admits that the Chikirivao patent publication fails to disclose the aspect of selecting "information from a corresponding field in the template so that the information will be linked to the rule". However, the Examiner states that this limitation is disclosed in the Androutsopoulos publication. Applicants fail to see how this aspect is disclosed in the Androutsopoulos publication, as there is no mention of administrator provided responses in the Androutsopoulos publication. Specifically, the Androutsopoulos publication fails to disclose the aspect of interaction with an administrator accessible template. Therefore, even if the general NLP teachings of the Androutsopoulos publication were to be applied to the teachings of the Chikirivao patent publication, the claimed invention would still not be anticipated. Furthermore, the motivation for combining the teachings of the Chikirivao patent publication with the Androutsopoulos publication are misplaced. The motivation that the Examiner presents relates to the "benefit of resolving pronoun anaphora and preventing user annoyance". This motivation does not address the reason why one having ordinary skill in the art would combine the references, as first, the contextual substitution in the Androutsopoulos publication relates to *user* input and second, the Androutsopoulos publication makes no reference to administrator managed templates.


For the foregoing reasons, Applicants believes that the subject matter of amended independent claims 1 and 35 is not rendered obvious by the Chikirivao patent publication in view of the Androutopoulos publication or any other prior art of record. Reconsideration of the rejections of independent claims 1 and 35 is respectfully requested. Claims 13-15 and 22-34 depend from and add further limitations to amended independent claim 1 and are believed to be patentable for the reasons discussed hereinabove in connection with amended independent claim 1. Claim 40 depends from and adds further limitations to amended independent claim 35 and is believed to be patentable for the reasons discussed hereinabove in connection with amended independent claim 35. Reconsideration of the rejections of dependent claims 13-15, 22-34, and 40 is respectfully requested.

### CONCLUSION

Based on the foregoing amendments and remarks, reconsideration of the rejections and allowance of pending claims 1, 13-15, 22-35, and 40 are respectfully requested.

Respectfully submitted,

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